# Exhibit C-1

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#### PerDiemCo LLC v. NexTraq PERDIEM Co., LLC's Preliminary Infringement Contentions U.S. Patent No. 10,021,198

This claim chart demonstrates NexTraq's infringement of U.S. Patent No. 10,021,198 and provides notice of such infringement, by comparing each element of the asserted claims to corresponding components, aspects, and/or features of the Accused Instrumentalities. This claim chart include information provided by way of example, and not by way of limitation.

"Accused Instrumentalities" as used herein refers to herein provide event-based notifications/alerts based on locations of fleets of vehicles, equipment, objects, drivers, and other assets equipped with sensors or tags (the Assets).

- 1. NexTraq offers the following tracking products and services (the Accused Instrumentalities), including but not limited to NexTraq® Fleet Tracking solution (https://www.nextraq.com/wp-content/uploads/2018/04/NexTraq\_New\_User\_Quick\_Start\_Guide.pdf), which provides data to NexTraq® Web Services (http://www.discretewireless.com/resources/APIReference.pdf) for use in various platforms and solutions that support:
  - (a) NexTraq®'s Fleet Visibility and Productivity products, services and solutions which are used for vehicle tracking (https://www.nextraq.com/services/vehicle-tracking/), asset tracking https://www.nextraq.com/services/asset-tracking/), geo-fencing and mapping (https://www.nextraq.com/services/geofencing-mapping/), real-time alerts (https://www.nextraq.com/services/real-time-alerts/), sensors (https://www.nextraq.com/services/sensors/) and integration with third party platforms, solutions and/or applications (https://www.nextraq.com/services/integration/);
  - (b) NexTraq® View<sup>TM</sup> and NexTraq® Connect<sup>TM</sup> mobile apps which are used by mobile work force (https://www.nextraq.com/services/mobile-apps/);
  - (c) NexTraq® Fleet Defender (https://www.nextraq.com/services/fleet-defender/) and NexTraq® Dashcam<sup>TM</sup> (https://www.nextraq.com/services/dashcam/) which are used for drive safety;
  - (d) NexTraq® Driver ID, which is used for Automatic Driver Assignment (https://www.nextraq.com/services/automatic-driver-assignment/)

#### NexTraq "Mobile Tracking Devices" and/or "Mobile Devices" means:

The Accused Instrumentalities track the Assets, which are attached to or carried by mobile devices, including but not limited to:

- 1-Vehicle Trackers Family of products (e.g., VT-2300, VT-3030, VT-2630, VT-3640)
- 2-Asset Trackers Family of products (e.g., AT-730, AT-5100)
- 3-Trailer Trackers (e.g., TT-2830)
- 4-GPS Tracking Devices (e.g., LMU26H201-NXT01)
- 5-Other GPS and sensor, e.g., temperature sensor, equipped mobile devices.

The analysis set forth below is based only upon information from publicly available resources regarding the Infringing Instrumentalities. An analysis of NexTraq's (or other third parties') technical documentation, and/or software source code, may assist in fully identifying all infringing features and functionality. Accordingly, PerDiemCo reserves the right to supplement this infringement analysis once such information is made available to PerDiemCo. Furthermore, PerDiemCo reserves the right to revise this infringement analysis, as appropriate, upon issuance of a court order construing any terms recited in the asserted claim.

Unless otherwise noted, PerDiemCo alleges that NexTraq directly infringes the '198 patent in violation of 35 U.S.C. § 271(a) by selling, offering to sell, making, using, and/or importing the Infringing Instrumentalities. The following exemplary analysis demonstrates that infringement. Unless otherwise noted, PerDiemCo further contends that the evidence below supports a finding of indirect or contributory infringement under 35 U.S.C. §§ 271(b) and/or (c), in conjunction with other evidence of liability under one or more of those subsections. NexTraq makes, uses, sells, imports, or offers for sale in the United States, or has made, used, sold, imported, or offered for sale in the past, without authority, or induces others to make, use, sell, import, or offer for sale in the past, without authority products, equipment, or services that infringe claims the '198 patent, including without limitation, the Accused Instrumentalities.

Unless otherwise noted, PerDiemCo alleges that each element of each claim asserted herein is literally met through NexTraq's provision of the Accused Instrumentalities. However, to the extent that NexTraq attempts to allege that any asserted claim element is not literally met, PerDiemCo believes and contends that such elements are met under the doctrine of equivalents. More specifically, in its investigation and analysis of the Infringing Instrumentalities, PerDiemCo did not identify any substantial differences between the elements of the patent claim and the corresponding features of

the Infringing Instrumentalities, as set forth herein. In each instance, the identified feature of the Infringing Instrumentalities performs at least substantially the same function in substantially the same way to achieve substantially the same result as the corresponding claim element.

To the extent the chart of an asserted claim relies on evidence about certain specifically identified Accused Instrumentalities, PerDiemCo asserts that, on information and belief, any similarly functioning instrumentalities also infringes the charted claim. PerDiemCo reserves the right to amend this infringement analysis based on other products made, used, sold, imported, or offered for sale by NexTraq. PerDiemCo also reserves the right to amend this infringement analysis by citing other claims of the '198 patent, not listed in the claim chart, that are infringed by the Accused Instrumentalities. PerDiemCo further reserves the right to amend this infringement analysis by adding, subtracting, or otherwise modifying content in the "Accused Instrumentalities" column of each chart.

Claim	US Patent	Description of the Infringement
	10,021,198	
Indep		NexTraq Fleet Tracking platform is a cloud-based solution for tracking assets using a standard Internet connection. On
	1. A method for	information and belief, the Accused Instrumentalities use applications, storage, on-demand services, computer networks,
Cl. 1	controlling	including servers and databases or other resources that are accessed with the Internet connection through on-premise or
	conveyance of	another provider's shared cloud computing framework, including servers and databases administered by third parties.
1 <b>-</b> p	location and	On information and belief, the Accused Instrumentalities use an access identity and management (IAM) services to
	tracking	securely control access to resources used by NexTraq's cloud-based solution. More specifically, the Accused
	information	Instrumentalities use the IAM to control who is authenticated (signed in) and authorized (has permissions) to use the
	provided as an	resources.
	Internet service,	
	comprising:	

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Claim	US Patent 10,021,198	Description of the Infringement
	10,021,176	GPS Satellite  Wireless Networks  Wireless Networks  Service Personnel  Supervisors/Managers  NexTraq Platform FLEET Mobile  NexTraq Fleet Tracking Platform Overview  (Source: Page No. 9 of http://www.alltrackusa.com/RTH_user_guide.pdf)

Claim	US Patent 10,021,198	Description of the Infringement
		NexTraq Fleet Tracking Platform
		This chapter introduces the NexTraq Fleet Tracking platform with an overview of its function and requirements. GPS vehicle tracking has developed into an essential tool for managing fleets. The NexTraq Fleet Tracking platform is a cloud-based solution which provides an efficient and cost-effective method to track your vehicle or fleet using a standard Internet connection.
		Once the NexTraq hardware, known as a mobile unit, is installed in a vehicle, it receives and sends data wirelessly. Data includes vehicle location and operational status, such as speed or time stopped. The NexTraq Fleet Tracking platform collects data from the mobile units which you can monitor and report on through the NexTraq web application and an Internet connection. The figure below illustrates the flow of data from locating the vehicle to the map information in the NexTraq Fleet Tracking platform on your computer screen.
		(Source: Page No. 9 of http://www.alltrackusa.com/RTH_user_guide.pdf)
		What is NexTraq's tech stack?
		NexTraq uses these technologies: Microsoft Sharepoint 2013,
		Crazy Egg, Dell PowerEdge T100 Tower Server, Dell PowerEdge
		R805 Rack Server, Dell PowerEdge R715 Rack Server, Amazon
		AWS Identity and Access Management (IAM) <u>See More</u>
		(Source: Page No. 4 of https://www.infotelligent.com/company/verizon-networkfleet/company/3485751)
		On information and belief, the Accused Instrumentalities currently use NexTraq's tracking applications executed by servers of a database management system (DBMS) constituting DBMS Applications (DBMSAs), including NexTraq® Fleet Tracking applications (the Accused Applications), which rely on managed database services used in an on-premise data warehouse solution.

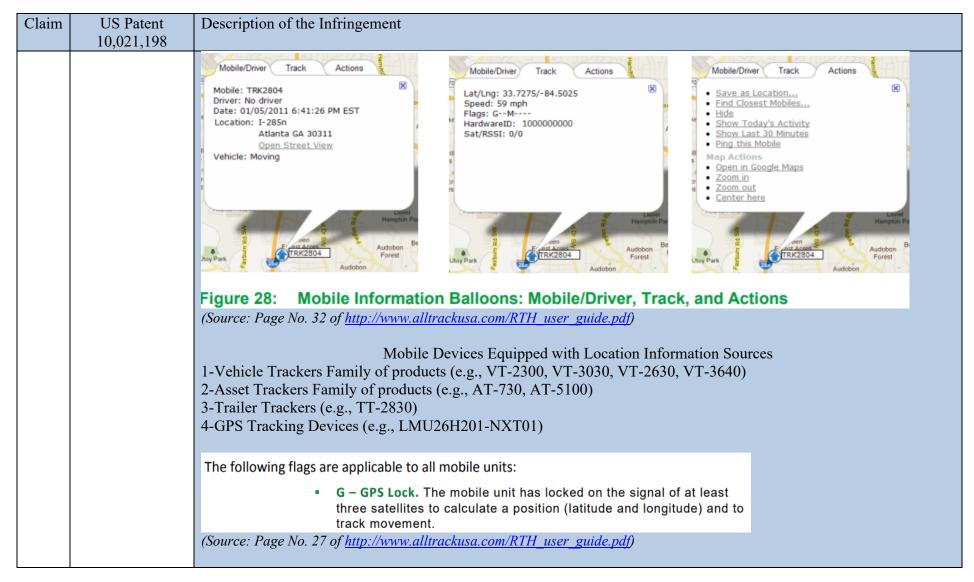
Claim	US Patent 10,021,198	Description of the Infringement
		On information and belief, NexTraq is re-platforming its Fleet Tracking platform so that the Accused Instrumentalities would transition to using AWS native services such as AWS Relational Database Service (RDS), a managed database service provided by AWS databases (DB) and AWS Redshift, Oracle, MS SQL, etc.
		NexTraq  ✔ Atlanta, GA 31150  ☐ Posted On April 12, 2022
		This Job has been expired.
		Job Company Rating Review Location News Insight All Jobs Competitors  Cloud Data Engineer
		Atlanta, GA, USA Req #3680 Tuesday, April 12, 2022 Responsibilities:
		<ul> <li>Design and build enterprise data solutions and applications in service of data analyst and data scientist needs for advanced analytics in the cloud</li> <li>Design and build fault tolerant data pipelines from acquisition to consumption using a combination of AWS native services, Python, Java, and existing on-premise acquisition tools (Informatica, MS SQL, etc.)</li> <li>Analyze, re-architect and re-platform on-premise data warehouse solutions to data platforms in AWS.</li> <li>Conduct detail assessments of current state data platforms and create an appropriate transition path to AWS.</li> <li>Qualifications:</li> </ul>
		<ul> <li>(5) + years experience building enterprise data management or data warehouse solutions or equivalent (2) + years experience building enterprise data pipelines using AWS native services and/or Python/Java.</li> <li>Experienced Technical Proficiency with the following relational data sources: AWS Redshift, AWS RDS, Oracle, MS SQL, MS Access, MS Excel</li> <li>Experienced Technical Proficiency with the following AWS services: S3, Lambda, Glue, Cloudwatch, Cloudformation, Kinesis, Athena, EMR, IAM, SQS, SNS</li> </ul>

Claim	US Patent 10,021,198	Description of the Infringement
	10,021,198	(Source: Page No. 1 of https://employzone.com/job-view/us-ga-atlanta/cloud-data-engineer/dayforcehcm/9505416277?ez source=alert&ez campaign=daily-alert&ez medium=azcs)  Accused Instrumentalities control conveyance of location and tracking information provided as an Internet service.  NexTraq Sarvers  Service Personnel  Supervisors/Managers  Supervisors/Managers  Figure 1: NexTraq Fleet Tracking Platform Overview  (Source: Page No. 9 of http://www.alltrackusa.com/RTH_user_guide.pdf)  Internet Service

Claim	US Patent 10,021,198	Description of the Infringement
		NexTraq Fleet Tracking Platform
		This chapter introduces the NexTraq Fleet Tracking platform with an overview of its function and requirements. GPS vehicle tracking has developed into an essential tool for managing fleets. The NexTraq Fleet Tracking platform is a cloud-based solution which provides an efficient and cost-effective method to track your vehicle or fleet using a standard Internet connection.
		Once the NexTraq hardware, known as a mobile unit, is installed in a vehicle, it receives and sends data wirelessly. Data includes vehicle location and operational status, such as speed or time stopped. The NexTraq Fleet Tracking platform collects data from the mobile units which you can monitor and report on through the NexTraq web application and an Internet connection. The figure below illustrates the flow of data from locating the vehicle to the map information in the NexTraq Fleet Tracking platform on your computer screen.
		(Source: Page No. 9 of <a href="http://www.alltrackusa.com/RTH_user_guide.pdf">http://www.alltrackusa.com/RTH_user_guide.pdf</a> )
		Fleet tracking technology is based off of three basic systems: Global positioning satellite location services, wireless data transfer and mapping through web applications. A box installed inside a vehicle reads its GPS location, direction of travel and speed. The box then uses a connection with cell towers to relay the GPS information to a data server, where it is translated by software into an interface that can be understood by an end user.
		(Source: Page No. 1 of <a href="https://www.nextraq.com/resource/hvac-companies-win-with-gps-fleet-management/">https://www.nextraq.com/resource/hvac-companies-win-with-gps-fleet-management/</a> )
		The Accused Instrumentalities use mobile devices equipped with location information sources for conveyance of location and tracking information.  Location Information
		Fleet tracking technology is based off of three basic systems: Global positioning satellite location services, wireless data transfer and mapping through web applications. A box installed inside a vehicle reads its GPS location, direction of travel and speed. The box then uses a connection with cell towers to relay the GPS information to a data server, where it is translated by software into an interface that can be understood by an end user.

Claim	US Patent	Description of the Infringement
	10,021,198	
		(Source: Page No. 1 of <a href="https://www.nextraq.com/resource/hvac-companies-win-with-gps-fleet-management/">https://www.nextraq.com/resource/hvac-companies-win-with-gps-fleet-management/</a> )
		The Mobile/Driver tab contains the mobile name, the driver name, last track date and time (based on user preferences), location or address of the mobile, and vehicle status. If the mobile is equipped with the Fleet Dispatch solution, Dispatch Status also appears on this tab.
		Click the Open Street View hyperlink to display the Google Maps Street View window. A message displays if Street View is not available at that location.
		If the Fuel Consumption and Cost option was selected in User Preferences, the vehicle status will include idling and length of idle time. In addition the Cost of Idle Loss amount will be estimated per the Fuel Information options on the Account page or defined in the Mobiles information on the Admin tab.
		The Track tab shows the unit's geographical position, speed, active flags, identification number of the unit, the number of satellites/radio signal strength rating, and, with Fleet Dispatch enabled, PND status.  (Source: Page No. 32 of <a href="http://www.alltrackusa.com/RTH">http://www.alltrackusa.com/RTH</a> user guide.pdf)

#### PerDiemCo LLC v. NexTraq PERDIEM Co., LLC's Preliminary Infringement Contentions U.S. Patent No. 10,021,198



Claim	US Patent 10,021,198	Description of the Infringement
		Fleet tracking technology is based off of three basic systems: Global positioning satellite location services, wireless data transfer and mapping through web applications. A box installed inside a vehicle reads its GPS location, direction of travel and speed. The box then uses a connection with cell towers to relay the GPS information to a data server, where it is translated by software into an interface that can be understood by an end user.  (Source: Page No. 1 of <a href="https://www.nextraq.com/resource/hvac-companies-win-with-gps-fleet-management/">https://www.nextraq.com/resource/hvac-companies-win-with-gps-fleet-management/</a> )
		GPS VEHICLE TRACKERS FOR EVERY PURPOSE
		The NexTraq® Vehicle Tracker VT-3030  A versatile OBD-II telematics device for simplified GPS fleet management.  The NexTraq® Vehicle Tracker VT-3030 is an easy-to-install, flexible OBD telematics device. It is an ideal solution for the passenger or light-duty vehicle applications where access to the vehicle diagnostics interface (OBD-II) is essential for monitoring vehicle health and driver behavior.
		(Source: Page No. 2 of <a href="https://www.nextraq.com/services/vehicle-tracking/">https://www.nextraq.com/services/vehicle-tracking/</a> )

Claim	US Patent 10,021,198	Description of the Infringement
		THE NEXTRAQ® VEHICLE TRACKER VT-3640
		Robust telematics device built for dynamic flexibility.  The NexTraq® Vehicle Tracker VT-3640 is a next generation telematics device that can take sensors, Garmin connections, and be used as a three-wired connector. Equipped with built-in ECU (Engine Control Unit) vehicle interface technologies, odometer, and engine diagnostic trouble codes (DTC) for both light and heavy-duty vehicles.  (Source: Page No. 3 of <a href="https://www.nextraq.com/services/vehicle-tracking/">https://www.nextraq.com/services/vehicle-tracking/</a> )

Claim	US Patent 10,021,198	Description of the Infringement
		THE NEXTRAQ® VEHICLE TRACKER VT-2630
		Leading edge fleet tracker for advanced fleet management with extensive capabilities.  The NexTraq® Vehicle Tracker VT-2630 is a fleet tracking device incorporating a powerful processing engine, LTE Cat 1 connectivity and built-in triple-axis accelerometer. Hidden from your driver's view, it's optimal for measuring driver behavior, vehicle performance and location throughout the day.
		(Source: Page No. 2 of https://www.nextraq.com/services/vehicle-tracking/)  (Source: Page No. 1 of https://www.ebay.com/itm/272838073110)

Claim	US Patent 10,021,198	Description of the Infringement
		Certified for use in the harshest conditions by the U.S. Department of Defense, this intrinsically-safe device features a built-in solar panel to help ensure battery life for up to ten years. NexTraq® Solar Asset Tracker (AT-5200) is a superior choice for use in remote conditions within virtually every industry.  (Source: Page No. 1 of https://www.nextraq.com/services/asset-tracking/)
		The NexTraq® Asset Tracker (AT-730) is an LTE-enabled, battery- operated, cellular asset tracker designed for multiyear deployment. Simple to install, this tracking device is perfect for unpowered assets in extreme and rugged environments.  (Source: Page No. 2 of <a href="https://www.nextraq.com/services/asset-tracking/">https://www.nextraq.com/services/asset-tracking/</a> )

Claim	US Patent 10,021,198	Description of the Infringement
		The NexTraq® SmartOne C Satellite Asset Tracker (AT-5100) is a satellite-managed asset tracker that utilizes comparative GPS positions and sensors to gather and transmit asset status
		information. (Source: Page No. 2 of https://www.nextrag.com/services/asset-tracking/)
		The NexTraq® Trailer Tracker (TT-2830) is a versatile asset tracker built for flexibility, with extensive monitoring capabilities to meet your needs. With a record of excellent field performance, it's ideal for assets. It is ideal for assets that are tethered but may sit disconnected to power sources for extended periods of time.  (Source: Page No. 3 of <a href="https://www.nextraq.com/services/asset-tracking/">https://www.nextraq.com/services/asset-tracking/</a> )

Claim	US Patent 10,021,198	Description of the Infringement
		(Source: Page No. 1 of

Claim	US Patent 10,021,198	Description of the Infringement
	tracking information about a first information sharing environment used by a plurality of authorized users;	Service Personnel  Supervisors/Managers  NexTraq Platform FLEET Mobile 1)  Figure 1: NexTraq Fleet Tracking Platform Overview  (Source: Page No. 9 of http://www.alltrackusa.com/RTH_user_guide.pdf)  In fact, each of the above tracking services provided by different Accused Applications, create a respective NexTraq information sharing environment as a first information sharing environment, which is used by authorized users such as
		account administrator and manager, identified by user IDs within a corresponding NexTraq information sharing environment.
		Users identified by user IDs

Claim	US Patent 10,021,198	Description of the Infringement	
		Users must be defined in order to have access to the NexTraq p will be able to add and update Users from the Admin tab. The U associated with the current account.  (Source: Page No. 207 of <a href="http://www.alltrackusa.com/RTH_user">http://www.alltrackusa.com/RTH_user</a> New User	Jser List contains all the users
		☐ Force Reset Password on Next Login  Time Zone: Eastern & Indiana (GMT-5:00)  ☐ Time Zone Uses Daylight Savings  Linked Driver: (Not Linked)  ☐ Admin Taxet Admi	Tab  Tab  ab  Tab  ance Tab  ag Tab  ab / Locations  ab / Zones  ab / Mobiles  ab / Drivers
		Mobile Access Permissions  ✓ User Can View the *All* Fleet  ✓ User Can View Unassigned Mobiles  * You must have these permissions granted to you in order to grant them to others.  Save Save and Create Cancel  Figure 308: New User Information  (Source: Page No. 209 of http://www.alltrackusa.com/RTH_user	

Claim	US Patent 10,021,198	Description of the Infringement
		12. In the Tab Permissions box, all checkboxes are checked by default except the
		Dispatch Tab and Metrics box. Check the Dispatch Tab box if the user will have the  NexTraq Dispatch solution. Check the Metrics box if the user will have permission to run the Metrics Dashboard. Uncheck the other boxes according to the user's permissions.
		13. If the user you are creating should have access to all tabs and the ability to create other users, check the box for Account Administrator.
		(Source: Page No. 209 of http://www.alltrackusa.com/RTH_user_guide.pdf)
1-b	providing one or	See 1-p for Internet service, database management system software (DBMSA), database and location and tracking
	more first	information.
	administrative	
	privileges used	See 1-a for server, first ISE and authorized users.
	by a first	
	administrator to	NexTraq (or one or more administrators employed by NexTraq) is provided with first administrative privileges for
	maintain said	maintaining the first information sharing environment. NexTraq (or one or more administrators employed by NexTraq)
	first information	uses the first administrative privileges to define a plurality of customer environments (which is formed by its customers'
	sharing	network of computing devices) who purchase the Internet service.
	environment, said one or more	Second ISEs
	first	Second ISES
	administrative	
	privileges being	
	used to:	
	a) define a	
	plurality of	
	second	
	information	

Claim	US Patent 10,021,198	Description of the Infringement
	sharing environments corresponding to a plurality of purchasers of said Internet service, b) provide each authorized user of said plurality of authorized users a respective user account name and password to use as part of a login process,	GPS Satellite  Wireless NetWorks  Service Personnel  Supervisors/Managers  NexTraq Platform FLEETMobile 1)  Figure 1: NexTraq Fleet Tracking Platform Overview  (Source: Page No. 9 of http://www.alltrackusa.com/RTH_user_guide.pdf)
	c) assign each authorized user of said plurality of authorized users to only one of said second information sharing environments of said plurality of	As such, the customer environments corresponding to purchasers of the Internet tracking services, are defined by NexTraq as a plurality of second ISEs. NexTraq (or one or more administrators employed by NexTraq) uses the first administrative privileges to provide each authorized a respective user account name and password to use as part of a login process.  Authorized user accounts

Claim	US Patent	Description of the Infringement
	10,021,198	
	second information sharing environments, said plurality of second information environments coexisting independent of each other within said first information sharing environment;	New User Information    First Name:   Joe

Claim	US Patent 10,021,198	Description of the Infringement	
		Logging Into NexTraq Fleet Tracking Platform	
		NexTraq	
		Username: Password:	
		Remember me for two weeks  Forgot Password?  Log In	
		Figure 2: Login Options  (C. D. N. L. C.	
		(Source: Page No. 14 of http://www.alltrackusa.com/RTH_user_guide.pdf)	
		To access the NexTraq Fleet Tracking platform, use the login address: http://go.nextraq.com/login.html	
		To log into the application:	
		<ol> <li>Type your user name in the Username text box.</li> </ol>	
		2. Type your password in the Password text box.	
		NOTE: If you do not have a username and/or password, please contact NexTraq Customer Support for assistance.	
		(Source: Page No. 14 of http://www.alltrackusa.com/RTH_user_guide.pdf)	
		NexTraq (or one or more administrators employed by NexTraq) uses first level of access authorization to user accounts in response to received log in requests that authorized users in their respective customer environments. In this way, each authorized users in their respective customer environments customer environment, which coexist independent of other customer environments customer environments.	contain IDs and passwords of the chorized user is assigned to its own
		sharing environment.	

Claim	US Patent 10,021,198	Description of the Infringement
1-c	providing second	See 1-p for Internet service, database management system software (DBMSA), database and location and tracking
	administrative	information.
	privileges used	
	to maintain said	See 1-a for server, first ISE and authorized users.
	plurality of	
	second	See 1-b for second ISEs and authorized user accounts.
	information	
	sharing	NexTraq's Accused Instrumentalities are used by a plurality of authorized users, such as managers of companies or
	environments to	organizations in various customer environments, which are second ISEs.
	a plurality of	NexTraq (or one or more administrators employed by NexTraq) uses the first administrative privilege to authorize a user
	second	in each customer environment to be a second administrator, identified in the DB by NexTraq, which is the first
	administrators,	administrator. In other words, it is NexTraq (or one or more administrators employed by NexTraq) that specifies its
	said second administrative	customer environments.
		Second Administrator
	privileges being used to:	Second Administrator
	a) define one or	A
	more groups	As used in this Agreement, the terms "you" and "your" refer to the customer indicated on the Order Form; "we," "us," "our" "NexTraq" and similar
	within a	terms refer to NEXTRAQ, LLC, a Delaware limited liability company, and its Affiliates; "Affiliates" means any existing or future legal entity which,
	respective	directly or indirectly, through one or more intermediaries, controls, is controlled by, or is under common control with NexTraq with the notion of
	second	control consisting of the power to direct the management and policies of the legal entity whether through the ownership of a fraction of the share
	information	(Source: Page No. 1 of <a href="https://www.nextraq.com/terms-and-conditions/">https://www.nextraq.com/terms-and-conditions/</a> )
	sharing	
	environment,	If you are designated as Account Administrator, you will see an additional option on the
	and	menu for creating custom mobile fields, Manage Mobile Fields.
	b) assign each	(Source: Page No. 168 of http://www.alltrackusa.com/RTH_user_guide.pdf)
	authorized user	
	of the respective	NexTraq (or one or more administrators employed by NexTraq) provides second administrative privileges to the second
	second	administrators for maintaining their customer environments.

Claim	US Patent 10,021,198	Description of the Infringement
	information sharing environment to	Second administrative privileges
	one or more of said groups;	As used in this Agreement, the terms "you" and "your" refer to the customer indicated on the Order Form; "we," "us," "our" "NexTraq" and similar terms refer to NEXTRAQ, LLC, a Delaware limited liability company, and its Affiliates; "Affiliates" means any existing or future legal entity which, directly or indirectly, through one or more intermediaries, controls, is controlled by, or is under common control with NexTraq with the notion of control consisting of the power to direct the management and policies of the legal entity whether through the ownership of a fraction of the share (Source: Page No. 1 of <a href="https://www.nextraq.com/terms-and-conditions/">https://www.nextraq.com/terms-and-conditions/</a> )
		3.3 We will assign you, and you will be responsible for controlling, username(s) and password(s) which permit you, your employees and independent contractors, access to the Platform and, if we have accepted an Order Form for online Services, access to and interaction with those Services and related APIs. You are responsible for ensuring that usernames and passwords are not shared or used by more than one individual.  (Source: https://www.nextrag.com/terms-and-conditions/)  Account administrator is given the second administrative privileges at the customer level (i.e., group level) with access to all tabs. Any administrator at the group level has second administrative privileges to define one or more groups within
		the customer's environment, and assign each authorized user to one or more groups within the customer's environment.

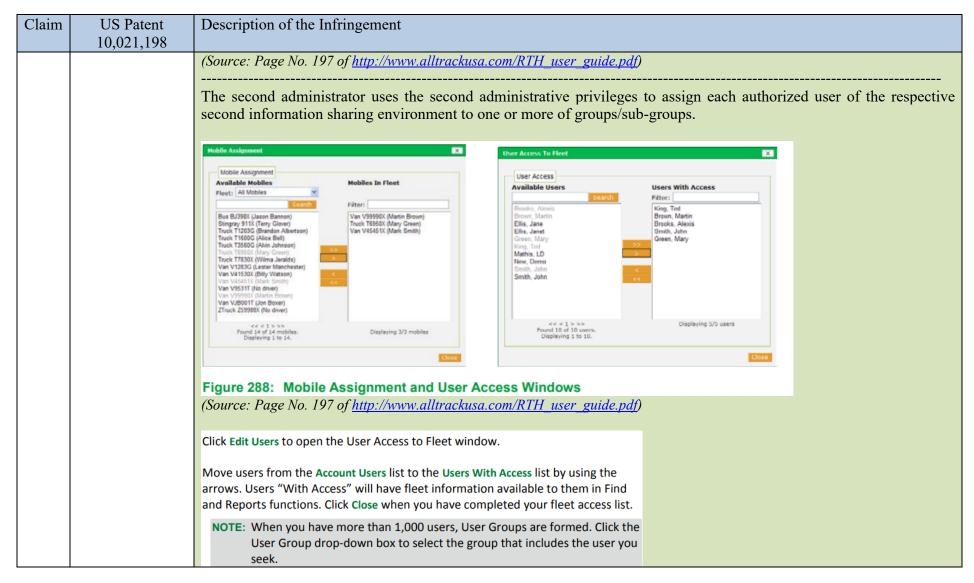
Claim	US Patent 10,021,198	Description of the Infringement
		New User    User Information

Claim	US Patent 10,021,198	Description of the Infringement
		Users must be defined in order to have access to the NexTraq platform. Account Administrators will be able to add and update Users from the Admin tab. The User List contains all the users associated with the current account.    Maintenance   Admin   Messages
		Admin Tab
		Perform administrative tasks within the NexTraq Fleet Tracking Platform. Here you may define zones and locations, edit driver and mobile information, establish fleet membership, define users and modify contact information.  (Source: Page No. 18 of <a href="http://www.alltrackusa.com/RTH_user_guide.pdf">http://www.alltrackusa.com/RTH_user_guide.pdf</a> )

Claim	US Patent 10,021,198	Description of the Infringement
	, ,	Admin Tab
		The Admin tab options allow you to edit, update, and maintain the application's data. You can perform the following administrative tasks on the Admin tab:
		Create, name, modify, delete, and set expiration dates for Locations
		<ul> <li>Create, name, modify, delete, and set expiration dates for Zones</li> </ul>
		<ul> <li>Name Mobiles and edit mobile unit information</li> </ul>
		Create Fuel Purchase records
		Create, modify, and delete Driver information
		<ul> <li>Create, modify, and delete Fleets</li> <li>Make Driver-mobile assignments</li> </ul>
		Edit Account contact information
		Maintain Fuel Information
		Activate Fuel Cards
		Create, edit, and delete custom map layers
		Create and edit Users.
		(Source: Page No. 168 of http://www.alltrackusa.com/RTH_user_guide.pdf)
		The second administrator uses the second administrative privileges to define groups/sub-groups within a respective customer environment.
		Groups/sub-groups within a respective customer information sharing environment
		Fleets
		The Fleets option allows you to group mobile units by criteria that may be helpful to your organization. For example, fleets may be grouped by territory, purpose, vehicle model, or fuel type.

US Patent 10,021,198	Description of the Infringement
	(Source: Page No. 196 of http://www.alltrackusa.com/RTH_user_guide.pdf)
	Creating a fleet
	To create a fleet:
	Choose Fleets from the Admin tab.
	Fleet List
	Create Fleet Eilter Fleets Remove Filters
	Edit Delete Name  # Mobiles Map Color  \$
	South Atlanta 2
	Training Fleet 1 3
	№         □         Trucks         4         ■           №         □         Vans         4         ■
	CCSV Excel DXML PDF
	5/5 fleets found.
	Figure 286: Fleet List Options
	(Source: Page No. 196 of http://www.alltrackusa.com/RTH_user_guide.pdf)

Claim	US Patent 10,021,198	Description of the Infringement
		Fleet Information  Name: NW Perimeter  Map Color: Green  If this fleet is ranked first alphabetically among its mobiles' fleets, this will be the border color of its mobiles' labels.  * All changes will not take effect until you click Save Fleet or Save and Create.  Save Fleet  Save and Create  Cancel  Figure 287: Create Fleet Options  (Source: Page No. 196 of http://www.alltrackusa.com/RTH_user_guide.pdf)
		Fleet Information  Name: South Atlanta  Map Color: Comflower Blue  If this fleet is ranked first alphabetically among its mobiles' fleets, this will be the border color of its mobiles' labels.  Save Fleet  Fleet Information  Wobile Assignment  Truck T6950X  Van V99990X  Truck T6950X  Van V99990X  Last Modified By: magreen  Created On: 07/07/2010 3:54:51 PM EDT  Last Modified By: magreen  Created By: magreen  Created By: magreen  Created By: magreen  Created On: 07/07/2010 3:54:51 PM EDT  Last Modified On: 07/07/2010 4:19:15 PM EDT  Figure 289: Edit Fleet Options



Claim	US Patent 10,021,198	Description of the Infringement
		Created/Modified   Created By: magreen   C
1-d	providing a plurality of second database management system software that executes on a plurality of computing devices of said plurality of authorized users, said plurality of second database management	(Source: Page No. 197 of http://www.alltrackusa.com/RTH_user_guide.pdf)  See 1-p for Internet service, database management system software (DBMSA), database and location and tracking information.  See 1-a for server, first ISE and authorized users.  See 1-b for second ISEs and authorized user accounts.  See 1-c for second administrator, second administrator privileges, and groups.  Second Database Management System Software

Claim	US Patent 10,021,198	Description of the Infringement	
	system software interfacing with said first	BACK-OFFICE SYSTEMS? NEXTRAQ	
	database management	PLAYS WELL WITH OTHERS.	
	system software, each second	Our customers rely on NexTraq to keep their operations running at their best. A big part of our shared success is the ease with which the NexTraq platform integrates with most 3rd party software. Here's just a few of the back-office systems our customers use with NexTraq every day:	
	database management	(Source: Page No. 1 of <a href="https://www.nextrag.com/services/integration/">https://www.nextrag.com/services/integration/</a> )	
	system software of said plurality of second	Does NexTraq® offer software integration?  Yes. NexTraq strives to create and maintain long-standing strategic partnerships with industry-leading software providers who offer added features and value to the NexTraq solution. Moreover, NexTraq has a robust Web Services offering – an open API platform that enables integration of your	
	database management	fleet data with third-party applications such as accounting, route optimization, and mobile workforce management. This allows our clients to move away from time-consuming manual processes to a completely automated solution.	
	system software enabling a first	(Source: Page No. 2 of <a href="https://www.nextrag.com/resources/fags/">https://www.nextrag.com/resources/fags/</a> )	
	authorized user of said plurality	NexTraq Fleet Tracking Platform	
	of authorized users to: a) define an event condition	This chapter introduces the NexTraq Fleet Tracking platform with an overview of its function and requirements. GPS vehicle tracking has developed into an essential tool for managing fleets. The NexTraq Fleet Tracking platform is a cloud-based solution which provides an efficient and cost-effective method to track your vehicle or fleet using a standard Internet connection.	
	based on an object location information corresponding to	Once the NexTraq hardware, known as a mobile unit, is installed in a vehicle, it receives and sends data wirelessly. Data includes vehicle location and operational status, such as speed or time stopped. The NexTraq Fleet Tracking platform collects data from the mobile units which you can monitor and report on through the NexTraq web application and an Internet	
	a location of an object and a zone	connection. The figure below illustrates the flow of data from locating the vehicle to the map information in the NexTraq Fleet Tracking platform on your computer screen.	
	information	(Source: Page No. 9 of http://www.alltrackusa.com/RTH_user_guide.pdf)	

Claim	US Patent 10,021,198	Description of the Infringement								
	corresponding to									
	a zone, and	In each customer environment, a second database management system software executes in computing devices of the								
	b) define an	authorized users of the respective customer group. The second database management system software interfaces with								
	event	the first database management system software, i.e., NexTraq's Fleet Tracking platform.								
	information									
	access code that	Second DBSMA interfacing with first DBSMA.								
	is a first access	GPS Satellite NexTraq Servers								
	list that specifies									
	one or more	March March 1								
	authorized users									
	of said plurality	Wireless Networks								
	of users to be	GPS Signal								
	provided an	Internet								
	event information	Service Personnel Supervisors/Managers								
		Supervisors/managers								
	comprising an alert when said									
	event condition									
	has been met,	FLEET Dispatch ()								
	said object	NexTraq Platform FLEET Mobile 1)								
	location being a	Figure 1: NexTraq Fleet Tracking Platform Overview								
	coordinate	(Source: Page No. 9 of http://www.alltrackusa.com/RTH_user_guide.pdf)								
	within a									
	coordinate	NexTraq uses the above identified Accused Instrumentalities for tracking locations of a plurality of mobile								
	system provided	objects/assets/vehicles.								
	by a location									
	information	Mobile Objects/Assets/Vehicles identified by OIDs								
	source,									

Claim	US Patent 10,021,198	Description of the Infringement
	said zone having a boundary defined by a plurality of coordinates within said coordinate system;	Edit Mobile    Mobile Information

Mobile List	Claim	US Patent 10,021,198	Descrip	tion of the Infi	ringemen	t							
Figure 266: Mobile List (Source: Page No. 182 of http:://www.altrackusa.com/RTH user guide.pdf)   Source: Page No. 182 of http:://www.altrackusa.com/RTH user guide.pdf)   Type of mobile device   Fuel type of mobile device   Fuel type of the whicle   License number of the wehicle   List (Source: Page No. 182 of http://www.altrackusa.com/RTH user guide.pdf)   License number of the wehicle   License number of th			Mobile	List									
Buses			Eilter M	Eilter Mobiles Bemove Filters									
Stingray   1000000911			Edit <u>Nan</u>	ne 💠 Hardware ID 💠	Map Color ¢	Odometer \$	Туре 💠	Fuel Type 💠	VIN ¢	License \$	Driver	Assigned Fleets	
### Truck   100000001   2200-1			Bus B339	98X 5333277398			Wahoo2	Gasoline					
### T1203G    Truck			Stin 911	gray X 1000000911				Gasoline					
Truck						34,374 mi	Wahoo2	Gasoline	ABCDEFGHIJK	ABC123		Trucks	
Truck						21,911 mi	Wahoo2	Gasoline			Bell, Alice		
Truck Truck Truck Track  Truck  Truck  Source: Page No. 182 of http://www.alltrackusa.com/RTH user guide.pdf)  The Mobile List includes the following information on each mobile unit:  Mobile name Hardware ID Map color associated with this mobile in map labels Odometer reading Type of mobile device Fuel type used in the mobile unit VIN number of the vehicle License number of the vehicle							Wahoo2	Diesel	XXXXX	ZZZZ			
Figure 266: Mobile List  (Source: Page No. 182 of <a href="http://www.alltrackusa.com/RTH">http://www.alltrackusa.com/RTH</a> user guide.pdf)  The Mobile List includes the following information on each mobile unit:    Mobile name   Hardware ID   Map color associated with this mobile in map labels   Odometer reading   Type of mobile device   Fuel type used in the mobile unit   VIN number of the vehicle   License number of the vehicle					_	37,000 mi	Wahoo2	Gasoline			Green, Mary	Atlanta, Training	
(Source: Page No. 182 of <a href="http://www.alltrackusa.com/RTH">http://www.alltrackusa.com/RTH</a> user guide.pdf)  The Mobile List includes the following information on each mobile unit:  Mobile name Hardware ID Map color associated with this mobile in map labels Odometer reading Type of mobile device Fuel type used in the mobile unit VIN number of the vehicle License number of the vehicle						36,701 mi	Wahoo2	Gasoline				Trucks	
			(Source:	bile List includes  M H  M  T  M  T  M  T  T  T  T  T  T  T  T	the follow dobile name lardware I dap color a dometer i type of mo- duel type u	ving inform ne D associated reading bile device sed in the r of the ve	with the mobile	on each n nis mobile	nobile unit	:			
							e vehic	le					
(Source: Page No. 182 of http://www.alltrackusa.com/RTH_user_guide.pdf)			(Source:				kusa.c	om/RTH	user guid	e.pdf)			

Claim	US Patent 10,021,198	Description of the Infringement
		Mobile Devices Equipped with Location Information Sources 1-Vehicle Trackers Family of products (e.g., VT-2300, VT-3030, VT-2630, VT-3640) 2-Asset Trackers Family of products (e.g., AT-730, AT-5100) 3-Trailer Trackers (e.g., TT-2830) 4-GPS Tracking Devices (e.g., LMU26H201-NXT01)
		The following flags are applicable to all mobile units:  G – GPS Lock. The mobile unit has locked on the signal of at least three satellites to calculate a position (latitude and longitude) and to track movement.  (Source: Page No. 27 of http://www.alltrackusa.com/RTH_user_guide.pdf)
		Fleet tracking technology is based off of three basic systems: Global positioning satellite location services, wireless data transfer and mapping through web applications. A box installed inside a vehicle reads its GPS location, direction of travel and speed. The box then uses a connection with cell towers to relay the GPS information to a data server, where it is translated by software into an interface that can be understood by an end user.  (Source: Page No. 1 of <a href="https://www.nextraq.com/resource/hvac-companies-win-with-gps-fleet-management/">https://www.nextraq.com/resource/hvac-companies-win-with-gps-fleet-management/</a> )

Claim	US Patent 10,021,198	Description of the Infringement
		GPS VEHICLE TRACKERS FOR EVERY PURPOSE
		The NexTraq® Vehicle Tracker VT-3030  A versatile OBD-II telematics device for simplified GPS fleet management.
		The NexTraq® Vehicle Tracker VT-3030 is an easy-to-install, flexible OBD telematics device. It is an ideal solution for the passenger or light-duty vehicle applications where access to the vehicle diagnostics interface (OBD-II) is essential for monitoring vehicle health and driver behavior.  (Source: Page No. 2 of <a href="https://www.nextraq.com/services/vehicle-tracking/">https://www.nextraq.com/services/vehicle-tracking/</a> )
		THE NEXTRAQ® VEHICLE TRACKER VT-3640
		Robust telematics device built for dynamic flexibility.  The NexTraq® Vehicle Tracker VT-3640 is a next generation telematics device that can take sensors, Garmin connections, and be used as a three-wired connector. Equipped with built-in ECU (Engine Control Unit) vehicle interface technologies, odometer, and engine diagnostic trouble codes (DTC) for both light and heavy-duty vehicles.

Claim	US Patent 10,021,198	Description of the Infringement
		(Source: Page No. 3 of https://www.nextraq.com/services/vehicle-tracking/)
		THE NEXTRAQ® VEHICLE TRACKER
		VT-2630
		Leading edge fleet tracker for advanced fleet management with extensive capabilities.  The NexTraq® Vehicle Tracker VT-2630 is a fleet tracking device incorporating a powerful processing engine, LTE Cat 1 connectivity
		and built-in triple-axis accelerometer. Hidden from your driver's view, it's optimal for measuring driver behavior, vehicle performance and location throughout the day.  (Source: Page No. 2 of https://www.nextraq.com/services/vehicle-tracking/)
		(Source: Page No. 1 of https://www.ebay.com/itm/272838073110)

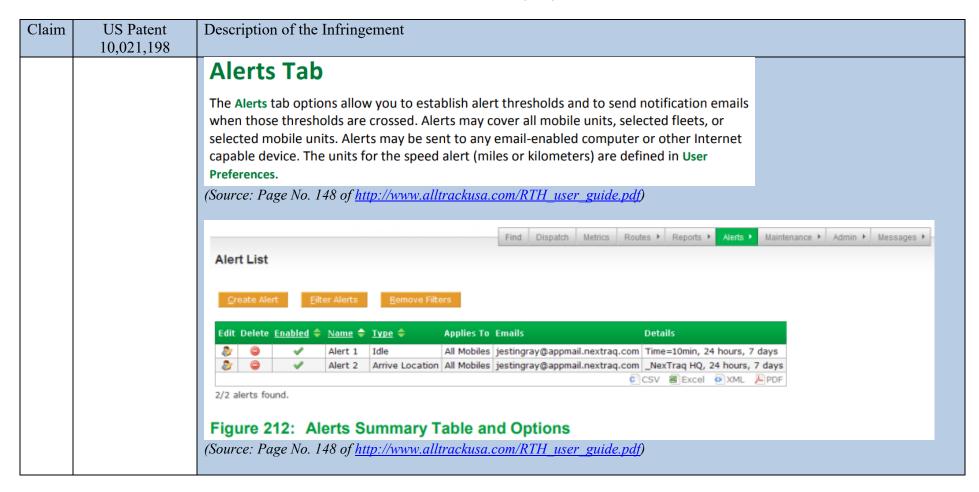
Claim	US Patent 10,021,198	Description of the Infringement
	10,021,198	Certified for use in the harshest conditions by the U.S. Department of Defense, this intrinsically-safe device features a built-in solar panel to help ensure battery life for up to ten years. Nexīraq® Solar Asset Tracker (AT-5200) is a superior choice for use in remote conditions within virtually every industry.  (Source: Page No. 1 of https://www.nextraq.com/services/asset-tracking/)  The Nexīraq® Asset Tracker (AT-730) is an LTE-enabled, battery-operated, cellular asset tracker designed for multiyear deployment. Simple to install, this tracking device is perfect for unpowered assets in extreme and rugged environments.  (Source: Page No. 2 of https://www.nextraq.com/services/asset-tracking/)

Claim	US Patent 10,021,198	Description of the Infringement
		The NexTraq® SmartOne C Satellite Asset Tracker (AT-5100) is a satellite-managed asset tracker that utilizes comparative GPS positions and sensors to gather and transmit asset status information.
		(Source: Page No. 2 of https://www.nextraq.com/services/asset-tracking/)
		The NexTraq® Trailer Tracker (TT-2830) is a versatile asset tracker built for flexibility, with extensive monitoring capabilities to meet your needs. With a record of excellent field performance, it's ideal for assets. It is ideal for assets that are tethered but may sit disconnected to power sources for extended periods of time.
		(Source: Page No. 3 of <a href="https://www.nextraq.com/services/asset-tracking/">https://www.nextraq.com/services/asset-tracking/</a> )

Claim	US Patent 10,021,198	Description of the Infringement
		(Source: Page No. 1 of https://www.ebay.com/itm/174395543130?chn=ps&norover=1&mkevt=1&mkrid=711-213727-13078-0&mkcid=2&itemid=174395543130&targetid=4580359295528874&device=c&mktvpe=&googleloc=&poi=&campaignid=437225724&mkgroupid=1228154759183859&rlsatarget=pla-4580359295528874&abcld=9300907&merchantid=51291&msclkid=ac556c89a9351a832f4c0fa25eb06e08)
		Each second database management system software enables a first authorized user to:
		(a) define an event condition, such as arrival and departure based on an object/asset/vehicle location information corresponding to a location of an object/asset/vehicle and a zone information corresponding to a zone/Landmark/Geofence.
		Event Condition Based on Zone and Object/asset/vehicle Location

Claim	US Patent 10,021,198	Description of the Infringement
	10,021,170	Geofencing
		Powered by Google™ Maps, NexTraq's geofencing technology allows you to create a virtual boundary around jobsites, vendors, customer locations —even areas you don't want your vehicles to enter. When your vehicles enter or exit these geofenced areas, you'll receive an alert. How can geofencing help your business?
		<ul> <li>Arrival and departure times: Let's say you want to know when your employees are on a jobsite. By drawing a geofence around the site, you can set up alerts to easily monitor when your employees arrive or leave from that location. Not only that, you can monitor for unauthorized vehicle use during working hours.</li> <li>Payroll and time management: For payroll purposes and billing accuracy, geofences are a game changer. Automatic alerts can be used to notify you when your vehicles arrive and depart from a jobsite. This creates a virtual time card, logging the time spent on the job. This can prove to be beneficial for employees who are paid by the hour or service workers who have charge-out rates.</li> <li>Asset protection: Problems with unauthorized use of company vehicles puts more than your asset at risk. A vehicle used after-hours or without permission can result in liability issues, increased insurance premiums, damaged property, and increased downtime. Triggered alerts can be used to notify you when a vehicle or piece of equipment moves outside of a geofenced area. This not only provides additional security, it offers peace of mind that your vehicles are safe.</li> <li>Stolen equipment: When a piece of equipment or a vehicle is moved outside of your geofence, you can receive an alert to notify you right when this action occurs. These alerts will only notify you so while the thieves may think they are getting away with your equipment, you know their location and can alert the police, saving you a great deal of money.</li> </ul>
		(Source: Page No. 1 of <a href="https://www.nextraq.com/services/geofencing-mapping/">https://www.nextraq.com/services/geofencing-mapping/</a> )
		You can activate 17 types of alerts:  Arriving at a defined location Departing a defined location Entering a defined zone
		Exiting a defined zone  (Source: Page No. 148 of <a href="http://www.alltrackusa.com/RTH_user_guide.pdf">http://www.alltrackusa.com/RTH_user_guide.pdf</a> )
		(b) define an event information access code that is a first access list that specifies one or more authorized users to be provided an event information, i.e., alerts.

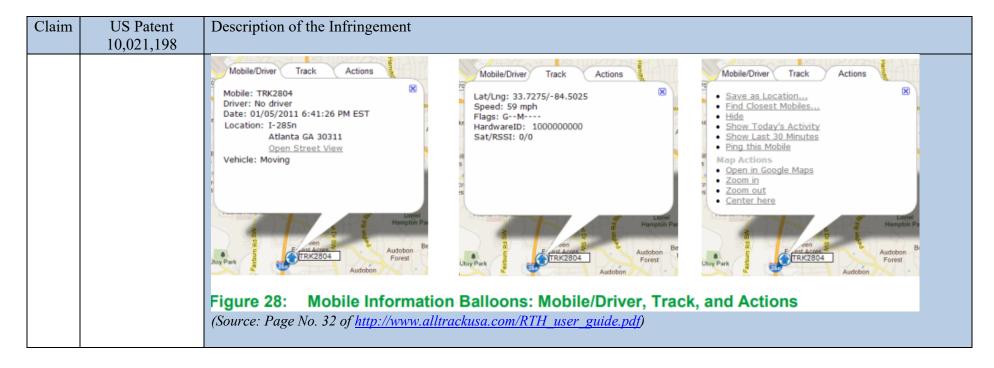
Claim	US Patent 10,021,198	Description of the Infringement	
		Information Access code Comprising Access List	
		The Alerts tab options allow you to establish alert thresholds and to receive notification emails when those thresholds are crossed. Alerts may cover all mobile units, selected fleets, or selected mobile units.	
		<ol> <li>To create an alert, begin by placing the cursor over the Alerts tab and clicking Create Alert.</li> <li>In the Create Alert page, choose the type of alert by clicking the drop-down list for Type.</li> <li>Enter the desired name for the alert.</li> </ol>	
		<ol> <li>Select the mobiles the alert applies to by clicking the drop-down list for Applies To.</li> <li>Choose the Days Active and Times Active (varies depending on Alert Type selected).</li> <li>Select the Email Subject.</li> </ol>	
		<ul><li>7. Choose the Notification Method by clicking on the drop down list.</li><li>8. Enter email addresses or SMS information of recipients to receive the alert email when triggered.</li></ul>	
		(Source: Page No. 9 of https://www.nextrag.com/wp-content/uploads/2018/04/NexTrag_New_User_Quick_Start_Guide.pdf)	
		Find Dispatch Metrics Routes Paperts Maintenance Admin Messages Alert List	
		Create Alert Filter Alerts Remove Filters	
		Edit Delete Enabled Name Type Applies To Emails  Details  All Mobiles jestingray@appmail.nextraq.com Time=10min, 24 hours, 7 days  Alert 2 Arrive Location All Mobiles jestingray@appmail.nextraq.com _NexTraq HQ, 24 hours, 7 days  CSV Excel NXML PDF	
		(Source: Page No. 148 of http://www.alltrackusa.com/RTH_user_guide.pdf)	
		The event information i.e., alert is conveyed when the event condition, such as arrival and departure has been met.	
		Alert	



Claim	US Patent 10,021,198	Description of the Infringement	
		The Alerts tab options allow you to establish alert thresholds and to receive notification emails when those thresholds are crossed. Alerts may cover all mobile units, selected fleets, or selected mobile units.	
		<ol> <li>To create an alert, begin by placing the cursor over the Alerts tab and clicking Create Alert.</li> <li>In the Create Alert page, choose the type of alert by clicking the drop-down list for Type.</li> <li>Enter the desired name for the alert.</li> </ol>	
		<ol> <li>Select the mobiles the alert applies to by clicking the drop-down list for Applies To.</li> <li>Choose the Days Active and Times Active (varies depending on Alert Type selected).</li> <li>Select the Email Subject.</li> </ol>	
		<ol> <li>Choose the Notification Method by clicking on the drop down list.</li> <li>Enter email addresses or SMS information of recipients to receive the alert email when triggered.</li> </ol>	
		(Source: Page No. 9 of https://www.nextraq.com/wp-content/uploads/2018/04/NexTraq_New_User_Quick_Start_G	<u>fuide.pdf</u> )

Cr	eate Alert	
	Type: Arrive Location  This alert notifies you when the selected mobiles stop within a user defined location.  Name: Alert 2  Enabled	
	Options	
	Applies To:   All Mobiles>	
	Location: Select Location	
	Schedule	
	Days Active: 7 days/week V Su V Mo V Tu V We V Th V Fr V Sa	
	Times Active: 24 hr/day Times will be interpreted according to your 'Display track times in' user preference.	
	Notification	
	Email Subject: Alert Name - Mobile Name	
h	Notification Method: E-Mail (PlainText)	
	Email Recipients: Type to search for users	
	SMS Recipients: Type to search for users	
	SMS requires users to have mobile	
	phone numbers on AT&T or Vertzon.	
	Save Alert Save and Create Cancel	

Claim	US Patent 10,021,198	Description of the Infringement
	10,021,130	(Source: Page No. 9 of <a href="https://www.nextraq.com/wp-content/uploads/2018/04/NexTraq_New_User_Quick_Start_Guide.pdf">https://www.nextraq.com/wp-content/uploads/2018/04/NexTraq_New_User_Quick_Start_Guide.pdf</a> )  Create Alert
		Alert Information  Name: Alert 3  V Enabled  Type: First Movement
		Applies To: All Mobiles  Days Active: Weekdays  Su  Mo  Tu  Wee  Th  Fr  Sa  Times Active: Between  7:00am  and 6:00pm  Times will be interpreted according to your 'Display track times in' user preference.  Email Subject: Alert Type - Alert Name - Driver Name  jestingray@appmail.nextraq.com
		Emails:  Please separate emails with commas.  Save Alert Save and Create Cancel
		Figure 213: Create Alert Options  (Source: Page No. 149 of <a href="http://www.alltrackusa.com/RTH_user_guide.pdf">http://www.alltrackusa.com/RTH_user_guide.pdf</a> )
		Each object/asset/vehicle location is a coordinate within a coordinate system provided by a GPS location information source. Each zone/landmark/geo-fence has a boundary defined by a plurality of coordinates within the coordinate system.



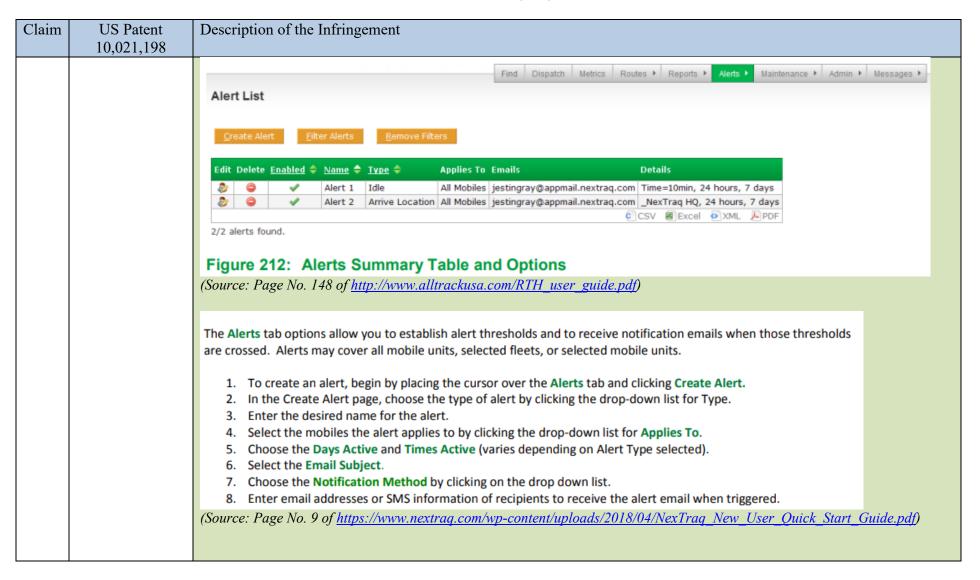
Claim	US Patent 10,021,198	Description of the Infringement
		Creating Zones
		To create a zone:
		Choose Create Zone from the Admin Zones submenu or, from the Zone List screen,     click Create Zone.
		<ol> <li>The Create Zone screen displays with your default location centered in the map and noted by a green shape with a centered red marker .</li> </ol>
		NOTE: Upon opening, the map centers on your account address.
		Create Zene    Create Zene   C
		Figure 260: Initial Zone Position and New Zone Defined
		(Source: Page No. 177 of http://www.alltrackusa.com/RTH_user_guide.pdf)
		Locate zone that has been defined using the Admin tab
		Locate a specific address
		Find a location using its latitude and longitude coordinates
		Create saved locations from the site of mobile(s), addresses found, or latitude and longitude coordinates
		(Source: Page No. 29 of http://www.alltrackusa.com/RTH_user_guide.pdf)
1-e	monitoring by said first	See 1-p for Internet service, database management system software (DBMSA), database and location and tracking information.

database management system software said object location information;  See 1-a for server, first ISE and authorized users.  See 1-b for second ISEs and authorized user accounts.  See 1-c for second administrator, second administrator privileges, and groups.  See 1-d for second database management system software, object, object location, event condition, zone, alert information access code.	Claim	US Patent 10,021,198	Description of the Infringement
NexTraq's database management system software monitors the object/vehicle/asset location information received a location information sources, e.g., GPS receivers, of mobile objects/assets/vehicles.    NexTraq Servers		10,021,198 database management system software said object location	See 1-a for server, first ISE and authorized users.  See 1-b for second ISEs and authorized user accounts.  See 1-c for second administrator, second administrator privileges, and groups.  See 1-d for second database management system software, object, object location, event condition, zone, alert and information access code.  NexTraq's database management system software monitors the object/vehicle/asset location information received from location information sources, e.g., GPS receivers, of mobile objects/assets/vehicles.  Service Personnel  Wireless Networks  Supervisors/Managers  Supervisors/Managers  FIGURE 1: NexTraq Fleet Tracking Platform Overview

Claim	US Patent 10,021,198	Description of the Infringement					
		NexTraq Fleet Tracking Platform					
		This chapter introduces the NexTraq Fleet Tracking platform with an overview of its function and requirements. GPS vehicle tracking has developed into an essential tool for managing fleets. The NexTraq Fleet Tracking platform is a cloud-based solution which provides an efficient and cost-effective method to track your vehicle or fleet using a standard Internet connection.					
		Once the NexTraq hardware, known as a mobile unit, is installed in a vehicle, it receives and sends data wirelessly. Data includes vehicle location and operational status, such as speed or time stopped. The NexTraq Fleet Tracking platform collects data from the mobile units which you can monitor and report on through the NexTraq web application and an Internet connection. The figure below illustrates the flow of data from locating the vehicle to the map information in the NexTraq Fleet Tracking platform on your computer screen.					
1.0		(Source: Page No. 9 of http://www.alltrackusa.com/RTH_user_guide.pdf)					
1-f	determining by said first database	See 1-p for Internet service, database management system software (DE information.	BMSA), database and location and tracking				
	management system software	See 1-a for server, first ISE and authorized users.					
	said event	See 1-b for second ISEs and authorized user accounts.					
	been met; and	See 1-c for second administrator, second administrator privileges, and grou	1-c for second administrator, second administrator privileges, and groups.				
		See 1-d for second database management system software, object, object information access code.	et location, event condition, zone, alert and				
See 1-e for monitoring by the first database management system software the object location information							

Claim	US Patent 10,021,198	Description of the Infringement					
		To the extent that mobile tracking devices do not have built-in geofences for device side geo-fencing, NexTraq's first database management system software determines whether the event condition, such as arrival and departure has been met.					
		GPS Satellite  Wireless Networks  Internet					
		Service Personnel  Supervisors/Managers  FLEET Dispatch ()  NexTraq Platform FLEET Mobile ()					
		Figure 1: NexTraq Fleet Tracking Platform Overview					
		(Source: Page No. 9 of http://www.alltrackusa.com/RTH_user_guide.pdf)					
1-g	conveying by said first database	See 1-p for Internet service, database management system software (DBMSA), database and location and track information.					
	management system software	See 1-a for server, first ISE and authorized users.					
	See 1-b for second ISEs and authorized user accounts.						
	second database management software of only	See 1-c for second administrator, second administrator privileges, and groups.					

Claim	US Patent 10,021,198	Description of the Infringement					
	those authorized	See 1-d for second database management system software, object, object location, event condition, zone, alert and					
	users included	information access code.					
	on said first access list.	See 1-e for monitoring by the first database management system software the object location information.					
	access fist.	See 1-e for monitoring by the first database management system software the object location information.					
		See 1-f for determining by the first database management system software that event condition has been met.					
		NexTraq's database management system software conveys the alert to the second database management of only to those authorized users included on the first access list.					
		Alerts Tab					
		The Alerts tab options allow you to establish alert thresholds and to send notification emails when those thresholds are crossed. Alerts may cover all mobile units, selected fleets, or selected mobile units. Alerts may be sent to any email-enabled computer or other Internet capable device. The units for the speed alert (miles or kilometers) are defined in User Preferences.					
		(Source: Page No. 148 of http://www.alltrackusa.com/RTH_user_guide.pdf)					



Claim	US Patent 10,021,198	Description of the Infringement
		Alert Information  Name: Alert 3  Type: First Movement  Applies To: All Mobiles  Days Active: Weekdays  Days Active: Between  Times Active: Between  Times Active: Between  Times will be interpreted according to your "Display track times in" user preference.  Email Subject: Alert Type - Alert Name - Driver Name  Jestingray@appmail.nextraq.com Emails:  Please separate emails with commas.  Save Alert Save and Create Cancel  Figure 213: Create Alert Options
4.	The method of claim 1, wherein said first authorized user can define zone information that specifies a user-defined zone.	(Source: Page No. 149 of <a href="http://www.alltrackusa.com/RTH">http://www.alltrackusa.com/RTH</a> user guide.pdf)  See 1-p for Internet service, database management system software (DBMSA), database and location and tracking information.  See 1-a for server, first ISE and authorized users.  See 1-b for second ISEs and authorized user accounts.  See 1-c for second administrator, second administrator privileges, and groups.

Claim	US Patent 10,021,198	Description of the Infringement
		See 1-d for second database management system software, object, object location, event condition, zone, alert and information access code.
		See 1-e for monitoring by the first database management system software the object location information.
		See 1-f for determining by the first database management system software that event condition has been met.
		See 1-g for conveying by said first database management system software the alert to second database management software of only those authorized users included on said first access list.
		The zones are defined by first authorized user, who is a group administrator.
7.	The method of claim 1, wherein said first	See 1-p for Internet service, database management system software (DBMSA), database and location and tracking information.
	authorized user can associate an	See 1-a for server, first ISE and authorized users.
	information location source	See 1-b for second ISEs and authorized user accounts.
	with an object.	See 1-c for second administrator, second administrator privileges, and groups.
		See 1-d for second database management system software, object, object location, event condition, zone, alert and information access code.
		See 1-e for monitoring by the first database management system software the object location information.
		See 1-f for determining by the first database management system software that event condition has been met.
		See 1-g for conveying by said first database management system software the alert to second database management software of only those authorized users included on said first access list.

Claim	US Patent 10,021,198	Desc	Description of the Infringement											
		with Mo		ect/asset/ve	ehicle.	ssociate a	an info	ormation	location	source,	e.g., GPS	receiver, in	cluded in mobile d	evices
		Edi	t <u>Name</u> 💠	Hardware ID \$	Map Color 💠	Odometer \$	Type 💠	Fuel Type \$	VIN ¢	License 💠	Driver	Assigned Fleets		
		2	Bus BJ398X	5333277398	_		Wahoo2	Gasoline			Bannon, Jason			
		2	Stingray 911X	1000000911			VT- 2200-1	Gasoline			Glover, Terry			
		2	Truck T1203G	5008781203		34,374 mi	Wahoo2	Gasoline	ABCDEFGHIJK	ABC123	Albertson, Brandon	Trucks		
		2	Truck T1600G	16000000		21,911 mi	Wahoo2	Gasoline			Bell, Alice	Trucks, North Atlanta		
		2	Truck T3560G	5003703560			Wahoo2	Diesel	XXXXX	zzzz	Johnson, Alvin			
		2	Truck T6950X	9003576950	_	37,000 mi	Wahoo2	Gasoline			Green, Mary	Trucks, South Atlanta, Training Fleet 1		
		2	Truck T7830X	9110953180		36,701 mi	Wahoo2	Gasoline			Jeralds, Wilma	Trucks		
		_		6: Mobile										
		(Sou	rce: Pa	ge No. 182 d	of <u>http://w</u>	ww.alltrac	kusa.c	om/RTH_	user guid	<u>le.pdf</u> )				

Claim	US Patent 10,021,198	Description of the Infringement						
	10,021,196	The Mobile List includes the following information on each mobile unit:						
		Mobile name						
		Hardware ID						
		Map color associated with this mobile in map labels						
		Odometer reading						
		Type of mobile device						
		Fuel type used in the mobile unit						
		VIN number of the vehicle						
		License number of the vehicle						
		Name of the driver						
		(Source: Page No. 182 of <a href="http://www.alltrackusa.com/RTH">http://www.alltrackusa.com/RTH</a> user guide.pdf)						
12.	The method of	See 1-p for Internet service, database management system software (DBMSA)	) database and location and tracking					
12.	claim 1, wherein	information.	i), database and location and tracking					
	the alert	miorimuton.						
	comprises a	See 1-a for server, first ISE and authorized users.						
	video transmitted	see 1 a for server, first fold and authorized users.						
	to a computing	See 1-b for second ISEs and authorized user accounts.						
	device based on	500 1 5 101 5000HG 1525 GHG GGHIOLIZOG GGOT GGOTGHIO.						
	the event	See 1-c for second administrator, second administrator privileges, and groups.						
	information	recording to the second						
	access code after	See 1-d for second database management system software, object, object local	ation, event condition, zone, alert and					
	the event	information access code.						
	condition is met.							
		See 1-e for monitoring by the first database management system software the object location information.						
		See 1-f for determining by the first database management system software that ev	vent condition has been met.					
		See 1-g for conveying by said first database management system software the alert to second database management software of only those authorized users included on said first access list.						

Claim	US Patent 10,021,198	Description of the Infringement					
		Accused applications executed by NexTraq is integrated with NexTraq Dashcam.					
		NexTraq Dashcam empowers you to take driver accountability and fleet safety to the next level.					
		It helps you make your drivers better—and protect your business.  NexTraq Dashcam gives you the HD video and real-time snapshots you need to:					
		<ul> <li>Incentivize good driving behavior</li> <li>Reduce poor driving behaviors</li> <li>Protect against insurance fraud</li> <li>Expose staged accidents</li> <li>Mitigate false/exaggerated whiplash claims</li> <li>Defend against conflicting reports of actual events</li> </ul>					
		(Source: Page No. 1 of <a href="https://www.nextraq.com/services/dashcam/">https://www.nextraq.com/services/dashcam/</a> )					
		NexTraq Dashcam is among the most advanced incident in-vehicle cameras in the industry.					
		Highlights include downloadable videos and images, real-time alerts, GPS location and LTE connectivity.					
		<ul> <li>HD video with wide angle lens</li> <li>Optional second camera for in-cab view</li> <li>Multiple infrared LEDs for night-time recording</li> <li>Real-time incident alerts with video and GPS location via email</li> <li>Video and image requests for a specific date and time</li> <li>Snapshots of what's going on in real time</li> </ul>					
		(Source: Page No. 2 of https://www.nextraq.com/services/dashcam/)					

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PerDiemCo LLC v. NexTraq
PERDIEM Co., LLC'S PRELIMINARY INFRINGEMENT CONTENTIONS
U.S. Patent No. 10,021,198

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